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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

October 15, 2020

VIA ECF

The Honorable Mary Kay Vyskocil United States District Court Daniel Patrick Moynihan Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Navarro, et al., 20 Cr. 160

Dear Judge Vyskocil:

On October 15, 2020, defendant Seth Fishman filed a motion seeking permission to travel to the United Arab Emirates, a foreign jurisdiction with which the United States has no extradition treaty. The Government opposes that application and respectfully requests until October 23, 2020, to submit a brief in opposition.

Respectfully submitted,

AUDREY STRAUSS Acting United States Attorney

by: /s Andrew Adams

Sarah Mortazavi Andrew Adams Benet Kearney Assistant United States Attorneys (212) 637-2520 / 2340 / 2260

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¹ As previously set forth in the Government's opposition to Fishman's original motion for travel to the UAE, Fishman's offer of an "irrevocable" waiver of extradition is illusory. *See United States v. Fishman*, 19 Mag. 10120, Dkt No. 9 (Dec. 10, 2019) (Parker, M.J.).